

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

WILLIAM JOSEPH WEBB JR.,  
Plaintiff,

CIV. ACT. NO. : 07-31-GMS

v.

FIRST CORRECTIONAL MEDICAL,  
ET. AL.,  
Defendants.

JURY OF TWELVE DEMANDED

**PLAINTIFF'S RESPONSES TO STATE DEFENDANTS' FIRST SET OF  
INTERROGATORIES DIRECTED TO PLAINTIFF**

1. With respect to each and every claim in your Complaint: (a) Identify all facts that support your contentions; (b) Identify the specific behavior or conduct that you allege that each State Defendant engaged in; (c) Identify all persons with knowledge of such contention or facts; (d) Identify all documents that reflect, refer to or relate to such contentions or facts.

**RESPONSE:** (a) The facts are set forth in the complaint and will be amended with specific dates and further particularity due to the recent filing of a Motion to Dismiss;

(b) Both State Defendants knew of my specific denial of adequate medical within the Delaware Department of Corrections system and failed to remedy such which created a deliberate indifference standard and cruel and unusual punishment.

(c) Elizabeth Webb, Carl Danberg, Stan Taylor, Gov. Ruth Ann Minner, Jean Deimer, Paul Howard, James Welch, Anthony Rendini, Bureau Chief Kearney, CMS, and others that will be identified as they are discovered due to an investigation is still ongoing.

(d) My medical records, my medical grievances filed, the transcripts of the hearings in Dover, other letters sent to my sister, and unidentifiable objects at this time.

2. Identify all documents which support your contentions or which you intend to offer into evidence at the trial of this matter.

RESPONSE: All medical sick call slips filed, grievances filed, medical records, letters sent to sister, and other unidentifiable objects at this time due to an investigation is still ongoing.

3. Identify all persons having knowledge of the allegations in the complaint.

RESPONSE: Refer to answer 1 (c).

4. Identify all persons whom you intend to call as witnesses at trial, excluding expert witnesses.

RESPONSE: As a preliminary answer to this question due to other witnesses will be discovered as the litigation in this subject matter continues: Elizabeth Webb and Jean Deimer.

5. Identify any physical evidence which relates in any way to any of the facts alleged in the complaint, or which you intend to offer in evidence at trial.

RESPONSE: My person with the permanent scars that I have to wear as a direct result of the actions described in the complaint, along with other documentary evidence that will be made at an appropriate time as discovery of such material(s) are made.

6. Identify each expert you expect to call to testify as a witness at trial.

RESPONSE: Plaintiff defers this question until He has an opportunity to secure expert witnesses as to each of His claims, this is not a waiver to have an expert witness to testify at trial, Plaintiff reserves the right to present one at the time he secures one as to each of His claims.

7. State the following about yourself: a. Full name, and any other names you have gone by or used; b. Social Security Number; c. Date of birth, and any other date of birth you may have used or given; d. Place of birth; e. Highest level of formal education that you successfully completed.

RESPONSE: a. William Joseph Webb Jr.

b. 222-54-2393

c. October 21, 1972

d. Wilmington General Hospital

e. 1990—Graduated from William Penn High School

1992—Completed Delaware Skills Center Vocational Training in Carpentry, etc...

2002—Certificate in Intro to Windows 2000

2002—Certificate in Office 2000

2003—Certificate in Advanced Access 2000  
2004—Certificate in Advanced Office 2000  
2007—Certificate in Advanced Excel 2000  
2007—Completed 1<sup>st</sup> Semester at Ashworth College in obtaining my Associate's Degree in Computer Information Management with an 100% in Intro. to Business; 70% in Bus. Communications I; 90% in College Mathematics; 90% in Windows XP; and 100% in Office XP I.

8. Identify all of your criminal convictions in the past 15 years, including the court, jurisdiction, date of conviction, date of sentencing, and the terms of the sentence.

RESPONSE: Plaintiff has just sent such in His Amended Responses to Defendant CMS' First Set of Interrogatories to Questions #3 and #10. Additionally, these documents are already in the Defendants' Attorneys possession due She works for the Dept. of Justice.

9. Identify all employment you have had in the past 15 years, including the name and address of each employer, name of supervisor, dates of employment, rate of pay, job title and responsibilities, and reason for termination.

RESPONSE: A&R Gen. Contractors—Bear,DE—Rick—Dates unknown, year was 1992—forget rate of pay, Carpenter's helper and responsibilities were all in the construction field— and laid off due to weather.

Concrete Reinforcement, Inc.—Northeast,MD—Supervisor unknown—end of 1992—\$10 @ hr.—Laborer/Installing Rebar for layout of building— and laid off due to job was completed.

Delaware Park—Christiana-Stanton Road Newark,DE—Supervisor unknown—during 1993—forget rate of pay—Maintenance and responsibilities were to keep the main sections of the building clear of trash during operating hours, clean the floors, and other various projects—quit due to conflict with other job.

Action Temporary Employment/B&R Temporary Employment—Maryland Ave.  
Wilm.,DE & Newark,DE—Jack Boyd—between the years of 1993 and 1996—rates of pay varied—  
Various work in the construction field—quit due to found permanent employment.

B&B Masonry—Christiana,DE—Mark Baranowski—1995—forget rate of pay—  
Mason tender and responsibilities included mixing mortar, setting up the sites, setting up scaffold, and  
other duties in the masonry field—terminated due to personal problems with other employees.

Mainline Masonry—Elsemere,DE—forget supervisor—October 1996 to January  
1997—\$10 @ hr.—Mason tender and responsibilities included mixing mortar, setting up the sites, setting  
up scaffold, and other duties in the masonry field—terminated due to health problems.

Gander Hill Prison—Wilm.,DE—no supervisor—during 1997—\$0.18 @ hr.—  
Tier man and duties were to clean Dorm I, help set up and serve chow—don't remember reasons for  
leaving this job.

J & T Improvements—Prices Corner area—Jim Moorefield—March 1998-May  
1999—\$6-\$8 @ hr.—Roofing mechanic—quit due to a better job.

Commercial Roofing of DE—Mowery Road New Castle,DE—Buddy Skinner—  
June 1999 to July 1999—\$10-\$21 @ hr.—came to prison.

Delaware Correctional Center Kitchen—Smyrna,DE—Prison Staff—July 2004  
to February 20, 2005 & June 2007 until present day—the first reason for leaving was a serious medical  
which is a part of this litigation.

10. Were you ever in the Armed Forces?

RESPONSE: No

11. Have you ever been a party to a lawsuit other than the present one?

RESPONSE: Yes, as to other information an objection is made due to it will not affect any of  
this litigation with possibly the case #06-734-GMS where some of these defendants are listed, but the  
claim is a lead-poisoning case.

12. Identify all physicians you have seen or been treated by in the past 10 years.

**RESPONSE:** Plaintiff reserves the right to answer this question until a later date until the names are sent via Patrick G. Rock when He sends a complete copy of the discovered information given the proper release forms filled out by Plaintiff.

13. Identify and describe all accidents, injuries and illnesses you have had in the past 15 years.

**RESPONSE:** Plaintiff reserves the right to answer this question until a later date until the names are sent via Patrick G. Rock when He sends a complete copy of the discovered information given the proper release forms filled out by Plaintiff.

14. Identify in detail the precise injury or harm you allege was sustained as a result of the allegations against State Defendants in the Complaint.

**RESPONSE:** I was denied adequate medical care and treated with a deliberate indifference standard along with being treated with cruel and unusual punishment.

15. Describe any medical treatment you received as a result of the allegations against State Defendants in the Complaint.

**RESPONSE:** I don't know of any, but I did receive the ultrasounds, but the Bureau Chief still denied my grievance appeal.

16. State: a. whether you requested any medical treatment at a Delaware Correctional facility which you believe in any way resulted from the allegations in your complaint; and b. the date and method used for any request listed in subparagraph a. of this interrogatory.

**RESPONSE:** The Plaintiff reserves the right to answer this interrogatory at a later date due to all of the paperwork is being put together from outside sources. This is not considered to be waiving or avoiding the answer.

17. State whether you filed a complaint or grievance at the correctional institution or with the Delaware Department of Corrections about the subject matter of each and every claim in your Complaint. If so, when were they filed, with whom were they filed, and what was the response? If not, why not?

RESPONSE: I filed sick call slips and grievances, they were all denied under false circumstances, also wrote letters to my Sister Elizabeth Webb with all of the information to take to the hearings held in Dover. As to other information, Plaintiff reserves the right to more fully answer this question at a later date due to other forms of communications were performed, in which Plaintiff is in the process of obtaining.

18. State the total amount of monetary damages you are claiming and the computation used to arrive at the sum.

RESPONSE: Plaintiff leaves this question unanswered due to juries award different amounts for Plaintiff's claims, a total investigation is still being continued which might change the total amount, and also the case might be given an early settlement amount, in which Plaintiff will leave the first settlement offer up to the defendant to make as a nice gesture.

19. Either prior to or subsequent to the alleged incident(s) referred to in your Complaint, have you ever suffered any injuries, illnesses or diseases identical or similar to those alleged in the Complaint? If so, state: a. A description of the injuries or diseases you suffered, including the date and place of occurrence; b. The names and addresses of all hospitals, doctors, or practitioners who rendered treatment or examination because of any such injuries or diseases.

RESPONSE: The Plaintiff reserves the right to answer this question later until He receives a copy of His medical files so He doesn't report erroneous information and all information is sent at one time.

20. Have you, or anyone acting on your behalf, obtained from any person any statement, declaration, petition, or affidavit concerning this action or its subject matter? If so, state: a. The name and last known address of each such person; and b. When, where, by whom and to whom each statement was made, and whether it was reduced to writing or otherwise recorded.

RESPONSE: Due to Plaintiff is still compiling information; Plaintiff reserves the right to answer this question at a later date with complete and accurate statements.

21. Have you, or anyone acting on your behalf, given or made any statement, declaration, petition, or affidavit concerning this action or its subject matter? If so, state: a. The name and last known address of each such person; and b. When, where, by whom each statement was made, and whether it was reduced to writing or otherwise recorded.

**RESPONSE:** Plaintiff reserves the right to answer this question at a later date due to all of the names of the parties maybe unknown to Him and Plaintiff doesn't want to pass erroneous statements or information around the subject matter of this action.

Submitted,

Dated: September 13, 2007

  
William Joseph Webb Jr.  
#256056 / D/EF17T  
1181 Paddock Road  
Smyrna, DE 19977

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

WILLIAM JOSEPH WEBB, JR.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 07-31-GMS
	)	
FIRST CORRECTIONAL MEDICAL,	)	JURY TRIAL REQUESTED
et al.,	)	
	)	
Defendants.	)	

**VERIFICATION AS TO ANSWERS:**

I hereby declare under penalty of perjury that the attached Plaintiff's Responses to State Defendants' Interrogatories are true and correct.

  
\_\_\_\_\_  
William Joseph Webb, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on September 13, 2007, I placed in the U.S. Postal Service mailbag at D.C.C. 1181 Paddock Road Smyrna, DE 1997 the attached Responses to State Defendants' 1<sup>st</sup> set of Interrogatories directed to Plaintiff, upon the following:

Eileen Kelly  
820 Norht French Street  
Wilmington, DE 19801

Patrick G. Rock  
913 Market Street  
Suite 800  
Wilmington, DE 19801

First Correctional Medical  
205 Giacinda Way  
Suite 115  
Tucson, AZ 85704

Dr. Ali  
1301 E. 12<sup>th</sup> Street  
Wilmington, DE 19809

  
William Joseph Webb Jr.  
#256056 / D/EF17T  
1181 Paddock Road  
Smyrna, DE 19977

INM William T. Webb Jr.  
SBI# 256 056 UNIT B/E F/17  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



Clerk of the U.S. Dist Ct. DE  
844 King Street  
Lookout 18  
Washington, DC

Legal Mail

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